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10 Attorneys for Defendants, ERIC CLAY, KEITH CURL, KEVIN HALE, and COUNTY OF TEHAMA
11 (also erroneously sued as TEHAMA COUNTY DISTRICT ATTORNEY'S OFFICE, TEHAMA
12 COUNTY DISTRICT ATTORNEY BUREAU OF INVESTIGATION, TEHAMA COUNTY CODE
13 ENFORCEMENT, TEHAMA COUNTY DEPARTMENT OF PLANNING, and TEHAMA COUNTY
14 DEPARTMENT OF BUILDING AND SAFETY)

15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17 DONNA MARIE WILL,

18 Case No.: 2:20-cv-01529-KJM-AC

19 Plaintiff,

20 **JOINT STIPULATION TO MODIFY**
21 **PRE-TRIAL SCHEDULING ORDER**
22 **AND [PROPOSED] ORDER**

23 v.
24 ERIC CLAY, KEITH CURL, KEVIN HALE,
25 COUNTY OF TEHAMA, TEHAMA
26 COUNTY DISTRICT ATTORNEY'S
27 OFFICE, TEHAMA COUNTY DISTRICT
28 ATTORNEY BUREAU OF
INVESTIGATION, TEHAMA COUNTY
CODE ENFORCEMENT, TEHAMA
COUNTY DEPARTMENT OF PLANNING,
TEHAMA COUNTY DEPARTMENT OF
BUILDING AND SAFETY, and DOES 1-50

Complaint Filed: 07/30/2020

29 Defendants.

30 /

31 This Stipulation is entered into by and between Plaintiff DONNA MARIE WILL ("Plaintiff") and
32 Defendants ERIC CLAY, KEITH CURL, KEVIN HALE, and COUNTY OF TEHAMA ("Defendants")
33 (collectively, "The Parties") by and through their respective counsel. The Parties enter into this stipulation
34 and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of

1 the scheduling order. The parties request to briefly continue the non-expert discovery deadline specifically
2 as it pertains to Plaintiff's responses to the following outstanding discovery requests: Defendant County of
3 Tehama's Requests for Production of Documents, Set Three; Defendant Eric Clay's Interrogatories, Set
4 Three; and Defendant County of Tehama's Interrogatories, Set Two ("Outstanding Discovery").

5 WHEREAS, this case does not currently have a trial date;

6 WHEREAS, the non-expert discovery cutoff is currently October 4, 2022. This date is also the last
7 day to hear non-expert discovery motions;

8 WHEREAS, the parties have diligently conducted discovery, including the exchange of written
9 discovery;

10 WHEREAS, Defendants served Plaintiff with the Outstanding Discovery on August 31, 2022.
11 Responses to the Outstanding Discovery are due on October 3, 2022;

12 WHEREAS, on September 29, 2022, Plaintiff's counsel requested a 30-day extension to allow
13 Plaintiff more time to gather documents and information. A 30-day extension would put the deadline to
14 respond to the Outstanding Discovery past the non-expert discovery cutoff and past the last day to hear
15 non-expert discovery motions;

16 WHEREAS, the Parties wish to extend the non-expert discovery deadline and the last day to hear
17 non-expert discovery motions only as it pertains to the Outstanding Discovery. The Parties do not wish to
18 make any other modifications to the Pre-Trial Scheduling Order at this time;

19 WHEREAS, the Parties have conferred and propose the following scheduling amendments:

20 • Last day for Plaintiff to provide written responses and documents in response to the
21 Outstanding Discovery: November 2, 2022
22 • Last day to hear motions regarding non-expert discovery related to the Outstanding
23 Discovery: November 17, 2022

24 Good cause exists for a brief, narrowly tailored continuance of the above deadlines to allow the
25 parties sufficient time to complete written discovery. Thus, the parties are requesting a continuance of the
26 non-expert discovery deadlines as it pertains to the Outstanding Discovery as stated above.

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1 **IT IS SO STIPULATED.**

2

3 Date: October 6, 2022

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8

9 By /s/ David R. Norton

10 David R. Norton
11 Safi U. Henson
12 Attorneys for Defendants

13

14 Date: October 6, 2022

15 Law Office of E. D. Lerman

16 By /s/ Editte D. Lerman (as approved on 9/29/22)

17 Editte D. Lerman
18 Attorney for Plaintiff

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20 **ORDER**

21 Based upon the Stipulation of the parties, the current scheduling order is modified as set forth above.

22

23 **IT IS SO ORDERED.**

24

25 DATED: October 6, 2022

26

27 
28 Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE